

Minnesota Pollution Control Agency

520 Lafayette Road, Saint Paul, Minnesota 55155-3898

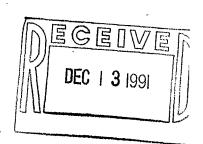
Telephone (612) 296-6300

12-9-91

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 0 4 1991

City Manager City of St. Louis Park 5005 Minnetonka Boulevard St. Louis Park, Minnesota 55416 President
Reilly Industries
1510 Market Square Center
151 North Delaware Street
Indianapolis, Indiana 46204



Dear Gentlemen:

RE: United States of America et al. vs. Reilly Tar & Chemical Corporation et al. File No. CIV 4-80-469; Consent Decree/Remedial Action Plan Section 6.1.5

In a letter dated January 14, 1991, the city of St. Louis Park (City), on behalf of Reilly Industries, requested authorization to cease pumping Ironton-Galesville Aquifer Source Control Well No. W105 pursuant to Section 6.1.5 of the Consent Decree/Remedial Action Plan (CD/RAP) in the referenced case.

The Minnesota Pollution Control Agency (MPCA) and the U.S. Environmental Protection Agency (EPA) have reviewed this request, along with the quality control documentation submitted on February 5, 1991, and hereby authorize the City to cease pumping of W105. As outlined in Remedial Action Plan (RAP) Section 6.1.5., monitoring of Well No. W105 shall be conducted quarterly for the first year following pumping cessation, and biannual thereafter. Should the results of this monitoring exceed the criteria outlined in Section 6.1.5., the City shall restart pumping of Well No. W105 as required by RAP Section 6.1.3

A copy of the EPA's data review has been enclosed for your information. If you should have any questions regarding this matter, please contact either Project Leader.

Sincerely,

Douglas Beckwith

Project Manager Superfund Unit

Site Response Section

Ground Water and Solid Waste Division

Minnesota Pollution Control Agency

Darryl Owens

Remedial Project Manager

Remedial Enforcement Response Branch

U.S. Environmental Protection Agency

DCB: jlm

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

MEMORANDUM

MR 18 JI

& Cotto

DATE:

FROM:

4-11-91

SUBJECT: Review of Reilly Tar Data

Patrick J. Churilla, Chemist, CRL Patrick J. Churille

Daryl Owens, RPM, RERB TO:

This review covers the following samples:

Project 007930 Sample 007930-0002-SA Project 008879 Sample 008879-0008-SA Project 009756 Sample 009756-0007-SA

009756-0008-SA

009756-0009-SA

Project 011045

Sample 011045-0010-SA

This review is based on summarized data only. Raw data was not provided to check calculations, compound identification or tran--scription errors.

1. CHAIN-OF-CUSTODY

The chain-of-custody forms for all of the samples are incomplete. Custody would have to be reestablished for this data to be legally admissible.

2. HOLDING TIMES

The holding times were acceptable for all of the samples.

3. INSTRUMENT CALIBRATIONS

All initial and continuing calibrations met the %RSD and %D criteria of 35%. No minimum relative response criteria were provided so response factors could not be evaluated.

4. SURROGATE RECOVERIES

For Project 009756 the secondary ion was used to do quantitation of D8-naphthalene in the blank. There is no reason for using the secondary ion in a clean blank. If there was a problem with the primary ion it is an indication of a system problem not a matrix problem.

For Project 011045 sample -0010-SA had a high recovery of D8naphthalene. I agree with the lab that no qualification is necessary.

5. MATRIX SPIKE/MATRIX SPIKE DUPLICATE
For Projects 008878 and 011045 no MS/MSD were done for medium level
samples. Spiking should be done on each matrix type in a dataset.

For Projects 007930 and 009756 the spiking levels appear to be too high. Matrix spikes are usually done at 3 to 5 times above the method detection limit. These spikes appear to be 20 to 50 times the MDL.

6. BLANKS

In general, the blanks associated with these samples were clean; however, there were several minor problems. First, I recommend that different blanks created on the same day for the same dataset be given different names to avoid confusion. Second, in Project 011045 the blank labeled BLK01-MED was missing from the data package.

7. INTERNAL STANDARDS

The internal standard area counts for these samples were very consistent, indicating good instrument stability.